



**Eric Gonzalez**  
District Attorney

**DISTRICT ATTORNEY  
KINGS COUNTY**

350 JAY STREET  
BROOKLYN, NY 11201-2908  
(718) 250-2000  
WWW.BROOKLYNDA.ORG

**[INSERT NAME]**  
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]  
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

**MOS NAME: VALERIE WADEALLISON**

**MOS TAX: [REDACTED]**

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

---

**Disclosure # 1:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS WADE-ALLISON:  
REGARDING 16-039, the analyst correctly reported the physical match result; however, the analyst also inaccurately excluded some fragments from originating from the same source. The analyst was issued a subsequent proficiency test (PM 17-015) that was successfully completed.

**Disclosure # 2:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS WADE-ALLISON:  
REGARDING 2016-070081 (Z014312, Z014313), 2016-063605 (Z012303), and 2017-026387 (Z015401, Z015413), a required statement on the hair analysis report regarding the sample length and suitability for nuclear and mitochondrial DNA analysis was edited from the SOP. Casework was unaffected.

**Disclosure # 3:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS WADE-ALLISON:  
REGARDING 2012-129677 (4000137415), 2013-079297 (3000256458), 2012-038521 (Z006377), 2014-000712 (6000007115, 6000007245), 2013-125914 (4000194131), 2014-026445 (2000301310), 2015-046978 (1000649544), 2016-070081(6000014058), 2017-026387 (Z015401) and 2018-023709 (A405096), the analyst used the term "hair-like fiber" to describe a sample on a report for hair analysis that had the appearance of a hair, but did not have sufficient characteristics to identify it as a hair. A memo was placed in the case file clarifying the definition of the term used by the analyst and clarifying that it was not being used to identify a fiber.

**Disclosure # 4:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS WADE-ALLISON:  
REGARDING 18-028, the analyst verified the results of a proficiency test and agreed with the original analyst's results; however, the results were inconsistent with the expected results.

**Disclosure # 5:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS WADE-ALLISON:  
REGARDING 2017-027334 (3000795627) and 2017-084054 R(3000870495), when swabbing for DNA collection, the analyst did not specify in the notes the area of the item that was swabbed, as per procedure. The area of the evidence that was swabbed was referenced in additional paperwork that the analyst prepared in the case file.

**Disclosure # 6:**

THE NYPD NOTED THE FOLLOWING NON-CONFORMANCE BY MOS WADE-ALLISON:

REGARDING 07T2224 (N547587), the analyst exceeded the laboratory custody limit of six months and had the case in their custody for 2 years.

Eric Gonzalez  
District Attorney  
Kings County